

EXHIBIT A

From: Verrecchio, Angela
Sent: Monday, April 19, 2010 3:41 PM
To: 'Matthew Shiels'; Pearson, Matthew
Subject: RE: Centocor v. Genentech
Attachments: 2010-04-19 Centocor Deposition Notice for Jeffrey P. Kushan.pdf.PDF

Matt,

Based on your confirmation that you will not be calling Mr. Hensley and your representation of his limited relevant information, we will agree not to depose Mr. Hensley at this time. If Genentech and/or City of Hope decide to call Mr. Hensley to testify at trial, Centocor will depose Mr. Hensley before trial.

In the meantime, please let me know whether you will accept the attached deposition notice for Jeffrey Kushan. If you will not accept the deposition notice, please let me know by the end of the day so that I can serve a subpoena.

Regards,
Angie

From: Matthew Shiels [mailto:mshiels@kirkland.com]
Sent: Monday, April 19, 2010 2:56 PM
To: Verrecchio, Angela; Pearson, Matthew
Subject: Centocor v. Genentech

Angie,

Genentech does not plan on calling Max Hensley at trial and we do not believe that Mr. Hensley possesses enough relevant information to make his deposition worthwhile. In light of this fact, we ask that you reconsider whether his April 19 deposition is necessary.

Thanks,

Matt Shiels

Matthew J. Shiels
Kirkland & Ellis LLP
300 North LaSalle | Chicago, IL 60654
Direct (312) 862-3299 | Fax (312) 862-2200
matthew.shiels@kirkland.com

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Kirkland & Ellis LLP or Kirkland & Ellis International LLP. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to postmaster@kirkland.com, and destroy this communication and all copies thereof, including all attachments.
